

1 WRIGHT, FINLAY & ZAK, LLP
2 R. Samuel Ehlers, Esq.
3 Nevada Bar No. 9313
4 Ramir M. Hernandez, Esq.
5 Nevada Bar No. 13146
6 7785 W. Sahara Avenue, Suite 200
7 Las Vegas, Nevada 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 rherandez@wrightlegal.net
10 *Attorney for Defendant, Avant, LLC*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 LARREN HENDERSON,

14 Plaintiff,

15 vs.

16 COMENITY BANK, LLC, AVANT, LLC,
17 EXPERIAN INFORMATION SOLUTIONS,
18 INC., EQUIFAX INFORMATION SERVICES,
19 LLC, and TRANS UNION LLC,

20 Defendants.

Case No.: 2:20-cv-00459-JAD-EJY

21 **UNOPPOSED MOTION TO EXTEND**
22 **DEADLINE TO RESPOND TO**
23 **PLAINTIFF'S COMPLAINT**

24 Defendant identified as Avant, LLC ("Avant"), by and through its undersigned counsel,
25 and reserving its right to assert any and all rights and/or defenses to this action, hereby files this
26 Unopposed Motion for Extension of Time to Respond to Complaint, and in support states as
27 follows:

1. On March 5, 2020, Plaintiff filed her Complaint [ECF No. 1]. Avant was served
with Plaintiff's Complaint on March 12, 2020. As such, Avant's current deadline to respond to
the Complaint is April 2, 2020.

2. As soon as Avant became aware of the Complaint, it endeavored to retain counsel
for the defense of this matter. The undersigned counsel was retained late last week.

3. Avant has undertaken (and continues to undertake) a good faith investigation into
Plaintiff's allegations. Avant respectfully requests an extension of time to respond to the
Complaint so that it (and/or newly retained counsel) may complete its investigation and prepare

1 an appropriate response, as well as confer with Plaintiff's counsel regarding potential resolution.

2 4. Counsel for Avant has contacted counsel for Plaintiff regarding the requested
3 extension, and counsel for Plaintiff has consented to the same. As such, no party will be
4 prejudiced by this Court granting the relief sought in this Motion.

5 5. This is the first request for an extension of time for Avant to file its responsive
6 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
7 any other party.

8 6. This Motion is filed in good faith and not for purposes of delay.

9
10 WHEREFORE, Avant respectfully requests that this Court enter an Order granting its
11 Unopposed Motion for Extension of Time to Respond to Complaint and providing Avant a 14-
12 day extension, through and including April 16, 2020, to respond to the Complaint.

13 DATED this 1st day of April, 2020.

14 WRIGHT, FINLAY & ZAK, LLP

15 /s/ Ramir M. Hernandez, Esq.

16 R. Samuel Ehlers, Esq.

17 Nevada Bar No. 9313

18 Ramir M. Hernandez, Esq.

19 Nevada Bar No. 11731

20 7785 W. Sahara Ave., Suite 200

21 Las Vegas, NV 89117

22 *Attorneys for Defendant, Avant, LLC*

23 IT IS SO ORDERED:

24 
UNITED STATES MAGISTRATE JUDGE

25 DATED: April 2, 2020